

Nicholas J. Santoro
Nevada Bar Number 0532
Email: nsantoro@nevadafirm.com
400 South Fourth Street, Third Floor
Las Vegas, Nevada 89101
Telephone: 702/791-0308
Facsimile: 702/791-1912

Co-Trustee of the Nicholas and Juanita Santoro Family Trust

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

Jointly Administered
Chapter 11 Cases
Judge Linda B. Riegler Presiding

JOINDER IN DIRECT LENDER
OPPOSITIONS TO DEBTOR'S MOTION
TO TEMPORARILY HOLD FUNDS
PENDING A DETERMINATION OF THE
PROPER RECIPIENTS (DOCKET
NUMBER 173)

In re:

USA Commercial Mortgage Company
06-10725 – Lead Case

USA Capital Realty Advisors, LLC
06-10726

USA Capital Diversified Trust Deed Fund, LLC
06-10727

USA Capital First Trust Deed Fund, LLC
06-10728

USA Securities, LLC
06-10729

Date of Hearing: June 5, 2006
Time of Hearing: 9:30 a.m.

Affecting:

☐ All Cases

Or only:

☒ USA Commercial Mortgage Company

☐ USA Capital Realty Advisors, LLC

☐ USA Capital Diversified Trust Deed Fund, LLC

☐ USA Capital First Trust Deed Fund, LLC

Debtors.

Nicholas J. Santoro, Co-Trustee of the Santoro Family Trust ("the Trust"), hereby joins in oppositions to Debtor's MOTION TO TEMPORARILY HOLD FUNDS PENDING A DETERMINATION OF THE PROPER RECIPIENTS ("Hold Funds Motion") filed by Direct Lenders at Docket Numbers 209, 215, 281, and 323, for the reasons cited therein, and for the reasons set forth in the Trust's Joinder in PARTIAL OPPOSITION TO DEBTOR'S MOTION AUTHORIZING DEBTOR, PURSUANT TO 11 U.S.C. §§ 105 AND 363(B)(1), TO ACCEPT LOAN PAYMENT PROCEEDS AND PROVIDE PARTIAL RELEASES OR FULL

1 RELEASES IN CONNECTION WITH THE SALE OF PROPERTIES SECURING LOANS
2 ORIGINATED BY THE DEBTOR TO THIRD PARTY BORROWERS, AND TO RATIFY
3 PARTIAL RELEASES PREVIOUSLY PROVIDED BY THE DEBTOR ("Partial Release
4 Request") at Docket Number 239. Though the Court indicated at the May 18, 2006, hearing on
5 the Partial Release Request that the Court was reserving judgment on the arguments raised by the
6 Trust and those joining with it until the hearing on the Hold Funds Motion set for June 5, 2006,
7 the Trust files this joinder in an abundance of caution to ensure the Trust can be heard June 5.

8 Dated this 23rd day of May, 2006.

9
10 /s/ Nicholas J. Santoro

11 Nicholas J. Santoro, Esq.
12 Nevada Bar Number 0532
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14 Las Vegas, Nevada 89101
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16 Facsimile: 702/791-1912

17 *Co-Trustee of the Santoro Family Trust*
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